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**Regional Airline Association**

1200 19th Street, NW • Suite 300 • Washington, DC 20036-2401 • 202/857-1170 • FAX 202/429-5113 • ARINC "WASRAXD"

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November 6, 1995

FEDERAL AVIATION ADMINISTRATION

Office of the Chief Counsel

Attention: Rules Docket (AGC-200), Docket 28293

800 Independence Avenue SW

Washington, DC 20591

Subject: COMMENTS - DOCKET 28293, NOTICE 95-12; Operational and Structural Difficulty Reports

The Regional Airline Association (RAA) is pleased to comment generally in support of this proposed rule, but with one suggested change, on behalf of its member regional airlines.

One member airline commented that reporting of "failures, defects, or malfunctions" of emergency evacuation lighting systems, in accordance with proposed §121.703(a)(11) and equivalent paragraphs in proposed Parts 125, 127, and 135, would require reporting of routine servicing requirements such as replacement of discharged batteries and burned out light bulbs - which are generally found during routine pre-flight checks of the emergency lighting systems. We do not believe that reporting of such items was intended, unless such light bulb or battery replacement fails to restore the system to normal operation.

Therefore, RAA suggests that proposed §121.703(a)(11), and similar paragraphs in proposed Parts 125, 127, and 135, be revised to exclude reporting of discharged batteries and failed light bulbs in emergency evacuation lighting systems which are found and replaced during routine pre-flight and maintenance checks.

Respectfully submitted,

REGIONAL AIRLINE ASSOCIATION

William C. Keil

Vice President, Technical Services

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